

### REMARKS

This Response is submitted within three months of the Office Action dated May 26, 2005. By this Response Applicants have amended claims 37-41. Claims 31-41 are pending in the application and claims 31, 35, 37 and 40 are in independent form. No new claims have been added. Accordingly, no new fees are required.

In the Office Action dated May 26, 2005, the Examiner rejected claims 37-38 and 40 under 35 U.S.C. 102(b) as allegedly being anticipated by Furukawa. Furukawa discloses a transporting apparatus that moves a single sheet of recording material "A" for printing thereon. The transporting apparatus includes "a power supply 18 for electrostatic attraction of the recording material A onto the platen 12." Such an electrostatic attraction device may function to attract a single sheet of recording material A onto a platen. However, such an electrostatic attraction device has limited application because it would not function to attract a stack of sheets into a correct position on a platen.

In contrast, Applicants teach a mechanical biasing device, namely, a set of coil springs 62 (see FIG. 1 and page 4, lines 19-31), that mechanically bias one sheet, or a stack of sheets, of print media into a printing position.

Accordingly, by this Response Applicants have amended claim 37 to recite "said support structure including a mechanical biasing device that biases said exposed sheet perpendicular to said printzone plane and into a predetermined printing position with respect to said printhead during printing on said exposed sheet." Similarly, Applicants have amended claim 40 to recite "mechanically biasing an exposed sheet in a direction perpendicular to a printzone plane and into a predetermined printing position."

Furukawa does not teach or suggest a mechanical biasing device that biases a sheet of print media into a printing position, as recited in Applicants' claims 37 and 40 as amended. Accordingly, Applicants request the Examiner to withdraw the rejection of independent claims 37 and 40, and corresponding dependent claim 38, and to allow these claims. Applicants note that dependent claims 39 and 41 are dependent on claims 37 and 40, respectively, and, for the reasons listed above, should also be allowed.

In the Office Action dated May 26, 2005, the Examiner rejected claims 31-36, 39 and 41 under 35 U.S.C. 103(a) as allegedly being unpatentable over Furukawa in view of Griswold. Applicants respectfully disagree.

Applicants independent claim 31 recites "means for maintaining plural sheets of print media including an

exposed sheet stationary with respect to said means during printing, said means for maintaining moving through said printzone during printing by said printhead on said exposed sheet." Applicants independent claim 35 recites "means for stationarily supporting plural sheets of print media including an exposed sheet relative to said means for supporting during printing on said exposed sheet; [and] advancing means for advancing said means for supporting through a printzone during printing on said exposed sheet." Applicants dependent claim 39 recites "wherein said support structure moves a stack of sheets parallel to said printzone plane during printing [on an exposed sheet of said stack]." Applicants dependent claim 41 recites "mechanically biasing a stack of sheets in a direction perpendicular to said printzone plane [during printing on an exposed sheet of said stack]." Accordingly, Applicants claims recite moving plural sheets that are to be printed upon. Neither Furukawa nor Griswold teach or suggest moving plural sheets through a printzone during printing on the sheets.

Furukawa discloses a transporting apparatus that moves a single sheet of recording material "A" for printing thereon. As discussed above, Furukawa does not teach or suggest moving plural sheets of recording material through a printzone for printing thereon. Moreover, Furukawa does not

teach or suggest a device to retain plural sheets on its platen 12, even if plural sheets were to be placed thereon.

Similarly, and in contrast to the Examiner's assertions, Griswold does not teach or suggest moving plural sheets through a printzone for printing on the sheets. In the Office Action the Examiner states that Griswold discloses a "platen (i.e. tray) adapted to support a stack of sheets of print media (figure 1, reference 13)." Figure 1 of Griswold shows a platen 13 with a book resting thereon, wherein the book is being copied from but is not being copied to. In particular, Griswold at column 3, lines 40-46 states: "The upper tray 20 here is pivotally hinged along its rear edge to the rest of the tray assembly 14 to pivot rearwardly away from the side 16 of the copying apparatus 10. This provides unobstructed corner book copying on the platen 13 as illustrated in FIG. 1 in contrast to FIG. 2. Since the lower tray 28 is spaced substantially below the platen 13, it offers no obstruction to corner book copying and in fact its downwardly sloping surface partially supports the otherwise free hanging portion of the book."

Furukawa and Griswold, either alone or in combination, do not teach or suggest plural sheets of print media that are moved through a printzone for printing thereon.

Accordingly, Applicants request the Examiner to withdraw the

rejection of independent claims 31 and 35, and dependent claims 32-34, 36, 39 and 41, and to allow these claims.

Conclusion

Claims 31-41 are believed to be in condition for allowance and Applicants respectfully request the same. If the Examiner should have any questions regarding these amendments, a call to Applicants' counsel, Ms. Ingrid M. McTaggart at (503) 230-7934, is respectfully requested. If the Examiner should have any other questions regarding the above referenced application, a call to Applicants' counsel Mr. Bob Wasson at (360) 212-2338, is respectfully requested.

Respectfully submitted,

  
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